



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Craig Donsanto
Director, Election Crimes Branch
Criminal Division
U.S. Department of Justice
P.O. Box 27518
Washington, DC 20038

SEP 16 2008

RE: MUR 5871
Thomas W. Noe

Dear Mr. Donsanto:

This is in reference to the matter involving Thomas W. Noe, et. al [REDACTED]
[REDACTED]

On April 23, 2007, the Commission found that there was reason to believe Thomas W. Noe knowingly and willfully violated the following provisions of the Federal Election Campaign Act of 1971, as amended: 2 U.S.C. §§ 441f by making contributions in the name of others; 441a(a)(1)(A) by making contributions to Bush-Cheney '04, Inc. that exceeded \$2,000; and 441a(a)(3)(A) by making contributions to Bush-Cheney '04, Inc. during the period between January 1, 2003 and December 31, 2004 that exceeded the individual aggregate limit of \$37,500. The Commission subsequently exercised its prosecutorial discretion to take no further action as to Mr. Noe, who has been convicted of criminal charges relating to the same conduct.

The Commission also found that twenty individual conduits knowingly and willfully violated 2 U.S.C. § 441f by permitting their names to be used to effect the making of a contribution in the name of another. The Commission has entered into conciliation agreements with seven of these individual conduits – Joseph Restivo, Howard D. Talbott, Sally Perz, Donna Owens, Betty Shultz, Sam Thurber, and Margaret Thurber – and decided to take no further action except send a letter of admonishment to thirteen of the remaining conduits. A copy of these agreements are enclosed for your information.

Documents related to the case will be placed on the public record within 30 days. See Statement of Policy Regarding Disclosure of Closed Enforcement and Related Files, 68 Fed. Reg. 70,426 (Dec. 18, 2003).

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[REDACTED]
[REDACTED] If you have any
questions, please contact Tracey L. Ligon, the attorney assigned to this matter, at (202) 694-1650.

Sincerely,

Thomasenia P. Duncan
General Counsel

BY: 
Ann Marie Terzaken
Associate General Counsel
for Enforcement

Enclosures
Conciliation Agreements

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